

## David Snyder - Re: Next Stakeholders meeting for R317-4 Onsite Wastewater Systems Rule

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**From:** Richard Jex <rjex@scgenterprises.com>  
**To:** David Snyder <dsnyder@utah.gov>  
**Date:** 9/15/2012 3:56 AM  
**Subject:** Re: Next Stakeholders meeting for R317-4 Onsite Wastewater Systems Rule  
**CC:** <ben@alternativeonsite.com>, <jlassley@brookfieldutah.com>, <cshupe@co.davis.ut.us>, <trichardson@co.wasatch.ut.us>, <scb@fbfs.com>, <mike@ghsgeotech.com>, "Gage Froerer" <gfroerer@le.utah.gov>, <aardvarkwaste@mac.com>, <dunn@rwau.net>, <bovard@summitcounty.org>, <cDiehl@ulct.org>, "Judith Sims" <judith.sims@usu.edu>, "Kate Johnson" <KATEJ@utah.gov>, "Leah Ann Lamb" <LLAMB@utah.gov>  
**Attachments:** Comments Summary 091412.pdf; Comments Summary 091412.pdf

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Dave,

I have attached my comments to this email. It's a bit long (28 pages), but I have put a lot of effort into my review and feedback with the goal of addressing my thoughts on the proposed draft rule. The comments are listed first as three program level issues followed by comments by section.

Overall, I like the changes in format and efforts to improve readability of the rule. I also see many changes and improvements that have been proposed. Congratulations on a great start in that effort. As I've indicated for a few years now, I hope that it is a start and that there is room to still discuss and make changes to the rule based on industry feedback, the stakeholders group and public comment opportunities.

Many of my comments are also on existing rule requirements, not just language proposed as new or changed. Furthermore, my comments are based on my experience within the industry over the last 15 years and after being able to get involved at varying levels within onsite programs in many states. Many of my comments are based on thoughts and perspective I've had on the rule language for many years. Others are more recent as I've continued to gain experience within the industry.

I have taken seriously the opportunity to review and comment on the rule as a whole, not just the changes being proposed. I sure hope that the detailed comments contained in my feedback are accepted in an objective and constructive manner. I have a tendency to be a 'detailed' oriented person, which I would hope is a benefit to the daunting task of rule writing and keeping everything clear while at the same time minimizing confusions.

With that being stated, there are issues that I hope are truly open for discussion within the draft rule. Some of which might not be the most comfortable to discuss. However, with discussion and awareness comes the opportunity to change, hopefully for the better. I look forward to this opportunity to be invited as a stakeholder and participate in this feedback process.

It should be an interesting meeting(s).

Have a good weekend!

Richard